

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN SECTION OF TENNESSEE
WESTERN DIVISION

SCOTT TURNAGE , CORTEZ D. BROWN,
DEONTAE TATE, JEREMY S. MELTON, ISSACCA
POWELL, KEITH BURGESS, TRAVIS BOYD,
TERRENCE DRAIN, and KIMBERLY ALLEN on
behalf of themselves and all similarly situated persons,

PLAINTIFFS,

v.

BILL OLDHAM, in his individual capacity as former
Sheriff of Shelby County, Tennessee; FLOYD
BONNER, JR., in his official capacity as Sheriff of
Shelby County, Tennessee; ROBERT MOORE, in his
individual capacity as former Jail Director of Shelby
County, Tennessee; KIRK FIELDS, in his official
capacity as Jail Director of Shelby County, Tennessee;
CHARLENE McGHEE, in her individual capacity as
former Assistant Chief of Jail Security of Shelby County,
Tennessee; REGINALD HUBBARD, in his official
capacity as Assistant Chief of Jail Security of Shelby
County, Tennessee; DEBRA HAMMONS, in her
individual capacity as former Assistant Chief of Jail
Programs of Shelby County, Tennessee; TIFFANY
WARD in her official capacity as Assistant Chief of Jail
Programs of Shelby County, Tennessee; SHELBY
COUNTY, TENNESSEE, a Tennessee municipality;
TYLER TECHNOLOGIES, INC., a foreign corporation;
GLOBAL TEL*LINK CORPORATION, a foreign
corporation; SOFTWARE AG USA, INC., a foreign
corporation; and SIERRA-CEDAR, INC., a foreign
corporation, SIERRA SYSTEMS GROUP, INC., a
foreign corporation.

DEFENDANTS.

**Case No. 2:16-cv-2907-
SHM/tmp**

**CLASS ACTION
COMPLAINT FOR
VIOLATIONS OF THE
CIVIL RIGHTS ACT OF
1871, 42 U.S.C. § 1983,
TENNESSEE COMMON
LAW, DECLARATORY, AND
INJUNCTIVE RELIEF**

**JURY TRIAL DEMANDED
PURSUANT TO FED. R.
CIV. PRO. 38(a) & (b)**

NOTICE OF APPEARANCE

COME NOW **HOLLY J. RENKEN** and the law firm of Black McLaren Jones Ryland & Griffee, P.C. and give notice of their appearance as associated counsel for Plaintiffs, Scott Turnage, Cortez D. Brown, Deontae Tate, Jeremy S. Melton, the Estate of Issacca Powell, Keith Burgess, Travis Boyd, Terrence Drain, and Kimberly Allen, in this cause.

Respectfully submitted,

/s/Holly J. Renken

Holly J. Renken (#21540)

Black McLaren Jones Ryland & Griffee PC

530 Oak Court Drive, Suite 360

Memphis, TN 38117

(901) 762-0535 (Office)

(901) 762-0539 (Fax)

hrenken@blackmclaw.com

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of July, 220, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send a notice of electronic filing to the following:

Robert E. Craddock, Esq.
Odell Horton, Jr., Esq.
Amber D. Floyd, Esq.
WYATT, TARRANT & COMBS, LLP
1715 Aaron Brenner Drive, Suite 800
Memphis, Tennessee 38120
(901) 537-1000
rcraddock@wyattfirm.com
ohorton@wyattfirm.com
afloyd@wyattfirm.com
*Counsel for Defendants Bill Oldham,
Robert Moore, Charlene McGhee,
Debra Hammons, and Shelby County, Tennessee*

Emmett Lee Whitwell, Esq.
SHELBY COUNTY ATTORNEY'S OFFICE
160 N. Main Street, Ste 950
Memphis, Tennessee 38103
(901) 222-2100
Lee.whitwell@shelbycountyttn.gov
*Counsel for Defendants Bill Oldham,
Robert Moore, Charlene McGhee,
Debra Hammons, and Shelby County, Tennessee*

Bradley E. Trammell, Esq.
BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.
165 Madison Avenue, Suite 2000
Memphis, Tennessee 38103
(901) 577-2121
btrammell@bakerdonelson.com
Counsel for Tyler Technologies, Inc.

Beth Bivans Petronio, Esq.
K & L GATES, LLP
1717 Main Street, Suite 2800
Dallas, Texas 75201
(214) 939-5815
Beth.petronio@klgates.com
Counsel for Tyler Technologies, Inc.

Russell B. Bundren, Esq.
James L. Murphy, Esq.
BRADLEY ARANT OULT CUMMINGS, LLP
1600 Division Street, Suite 700
Nashville, Tennessee 37210
bbundren@babco.com
jlmurphy@bradley.com
*Counsel for Defendant Global Tel*Link
Corporation*

Douglas F. Halijan, Esq.
William D. Irvine, Esq.
BURCH PORTER & JOHNSON, PLLC
130 N. Court Avenue
Memphis, Tennessee 38103
(901)-524-5000
dhalijan@bpjlaw.com
wirvine@bpjlaw.com
Counsel for Defendant, Software AG USA, Inc.

Kevin D. Bernstein, Esq.
Albert G. McLean, Esq.
SPICER RUDSTROM, PLLC
119 s. Main Street, Suite 700
Memphis, Tennessee 38103
kbernstein@spicerfirm.com
amclean@spicerfirm.com
Counsel for Defendant Sierra-Cedar, Inc.

Robert A. McLean, Esq.
Garrett M. Estep, Esq.
FARRIS BOBANGO BRANAN, PLC
999 S. Shad Grove Road, Suite 500
Memphis, Tennessee 38120
(901) 259-7100
rmclean@farris-law.com
gestep@farris-law.com
Counsel for Defendant Tetrus Corp.

Heather Gwinn Pabon, Esq.
GORDON REES SCULLY MANSUKHANI
222 Second Avenue South, Suite 1700
Nashville, Tennessee 37210
(615-772-9010)
Counsel for Defendant Sierra Systems Group, Inc.

/s/Holly J. Renken